

DANIEL G. BOGDEN
United States Attorney
District of Nevada
BLAINE T. WELSH
Assistant United States Attorney

BENJAMIN MIZER
Principal Deputy Assistant Attorney General
WILLIAM C. PEACHEY
Director, Office of Immigration Litigation-DCS
WILLIAM C. SILVIS
Assistant Director
T. MONIQUE PEOPLES
Trial Attorney
U.S. Department of Justice, Civil Division
Office of Immigration Litigation-DCS
P.O. Box 868, Ben Franklin Station
Washington, D.C. 20044
Phone: (202) 598-8717
Facsimile: (202) 305-7000
Email: monique.peoples@usdoj.gov

Attorneys for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

MATTHEW OBIM OKEKE,)	
)	
Petitioner,)	Case No. 2:15-cv-02178-APG-PAL
)	
v.)	
)	
JEH JOHNSON, Secretary of U.S.)	ORDER
Department of Homeland Security, <i>et al.</i> ,)	
)	
Respondents.)	

JOINT STIPULATION FOR EXTENSION OF DEADLINE TO ANSWER PETITION
(Third Request)

Pursuant to LR 6-1, 6-2, and 7-1, the parties jointly stipulate to extend the deadline for Respondents to answer or otherwise respond to the Petition filed in this matter. In support, the parties state as follows:

1 1. On November 16, 2015, Petitioner filed a petition for writ of mandamus. *See*
2 Pet., ECF No. 1. Specifically, Petitioner seeks an order from the Court “to compel
3 Respondents to act on Petitioner’s completed I-485 Application to Adjust Status.” *Id.* at ¶ 1.

4 2. Although Plaintiff completed service on Respondents on February 1, 2016, the
5 civil docket entry notation originally indicated that Respondents’ answer deadlines were
6 February 1 and 2, 2016. *See* Dkt. entry at ECF No. 8. The parties therefore stipulated and
7 agreed that good cause existed to correct Respondents’ answer deadline from the deadlines
8 noted on ECF No. 8 to the correct answer date of April 1, 2016, which the Court approved on
9 February 9, 2016. *See* ECF Nos. 9 & 11; Fed. R. Civ. P. 12(a)(2).

10 3. Subsequently, the parties agreed to further extend Respondents’ answer
11 deadline by thirty days from April 1, 2016, to May 2, 2016, in order to allow the U.S.
12 Citizenship and Immigration Services (“USCIS”) additional time to review and process
13 Petitioner’s I-485 Application to Adjust Status. *See* ECF No. 13. Because USCIS’
14 adjudication of Petitioner’s I-485 application could potentially resolve the issues in the Petition
15 without further litigation, the parties stipulated and agreed that good cause existed for the
16 extension, which was approved by the Court. *See* ECF Nos. 13 & 14.

17 4. Although USCIS has now adjudicated Petitioner’s I-485 application, another
18 brief extension of Respondents’ answer deadline is required for USCIS to issue to Petitioner a
19 letter notifying him of USCIS’ final decision on his application.

20 5. Accordingly, the parties stipulate and agree that good cause exists to extend
21 Respondents’ answer deadline by thirty days from May 2, 2016, to June 1, 2016.

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WHEREFORE, the parties stipulate and agree that good cause exists to extend Respondents' answer deadline by thirty days from May 2, 2016, to June 1, 2016.

Respectfully submitted this 2nd day of May 2016.

AGWARA & ASSOCIATES <u>/s/ Liborius Agwara</u> LIBORIUS AGWARA 4693 E. Flamingo Road Las Vegas, Nevada 89121 (702) 385-4800 agwaralaw@yahoo.com Attorneys for Petitioner	WILLIAM C. SILVIS Assistant Director <u>/s/ T. Monique Peoples</u> T. MONIQUE PEOPLES Trial Attorney Attorneys for Respondents
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IT IS SO ORDERED:


UNITED STATES DISTRICT JUDGE

DATED: May 2, 2016